

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT

IN THE MATTER OF:

ANDREW NEAL PERLIN

CHAPTER 13
CASE NO. 18-45309-MAR
JUDGE MARK A RANDON

Debtor /

TRUSTEE'S OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN

Now Comes the Chapter 13 Trustee, KRISPEN S. CARROLL, and files her objections pursuant to E.D. Mich. LBR 3015-3(a) and opposes confirmation of the Chapter 13 Plan where it does not comply with Bankruptcy Code provisions, 11 U.S.C. §§ 1325, 1322, other applicable provisions of Title 11 Chapter 13 and Local Bankruptcy Rules, as follows:

1. Trustee requires debtor to remit the 2017 income tax refund to the Trustee by a date certain or provide verification of the offset.
2. Trustee objects to debtor's apparent lack of good faith in failing to make full disclosure of debtor's financial affairs as required by 11 U.S.C. § 521(1) including live-in girlfriend's income and expenses. Trustee requires amended Schedules I and J, Means Test and verification of debtor's live-in girlfriend's income.
3. Trustee requests verification of debtor's domestic support obligation as the on-going payment may include an amount toward arrearages which are being paid by the Trustee pursuant to the Chapter 13 Plan.
4. Trustee requests copies of post-petition personal and business bank statements to verify debtor's income. Trustee requires the verification to be received by the Trustee immediately.
5. The Trustee objects to the following expenses of the debtor(s) (Schedule J) as

excessive and unreasonable affecting the net disposable income available to fund the Plan in contravention of 11 U.S.C. § 1325(a)(3) and/or 11 U.S.C. § 1325(b):

- a. Auto insurance - \$267.00 (pursuant to debtor's testimony, he is not paying for auto insurance).
- 6. Trustee requires an affidavit indicating debtor has not engaged in any form of gambling since the § 341 First Meeting of Creditors.

Wherefore, the Chapter 13 Trustee prays this Honorable Court deny confirmation of the debtors' Chapter 13 Plan.

Dated: June 14, 2018

OFFICE OF THE CHAPTER 13 TRUSTEE -DETROIT
KRISPEN S. CARROLL, CHAPTER 13 TRUSTEE

/s/ MARGARET CONTI SCHMIDT

Krispen S. Carroll (P49817)
Margaret Conti Schmidt (P42945)
719 Griswold Street, Ste 1100
Detroit, MI 48226
(313) 962-5035
notice@det13ksc.com

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CERTIFICATE OF MAILING

I hereby certify that on the date indicated below, I electronically filed TRUSTEE'S OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

JOHN Z KALLABAT
31000 NORTHWESTERN HIGHWAY
SUITE 201
FARMINGTON HILLS, MI 48334

and I hereby certify that I have mailed by United States Postal Service the above mentioned documents to the following non-ECF participants:

Andrew Neal Perlin
30760 Ivy Glen Ct
Bingham Farms, MI 48025

June 14, 2018

/s/ Shannon Horton

SHANNON HORTON

For the Office of the Chapter 13 Trustee-Detroit
719 Griswold Street, Ste 1100
Detroit, MI 48226
(313) 962-5035
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